

Jeffrey D. Wexler, State Bar No. 132256
PILLSBURY WINTHROP SHAW PITTMAN LLP
725 South Figueroa Street, Suite 2800
Los Angeles, CA 90017-5406
Telephone: (213) 488-7129
Facsimile No.: (213) 629-1033
jeffrey.wexler@pillsburylaw.com

Attorneys for Plaintiffs and Counterdefendants
Dependable Solutions, Inc., Dependable
Rights, Ltd., and Martin Malysz and
Counterdefendants Timothy Medora and
The Medora Group, Inc.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

DEPENDABLE SOLUTIONS, INC.,
a California corporation;
DEPENDABLE RIGHTS, LTD., a
United Kingdom private limited
company; and MARTIN MALYSZ,

Plaintiffs,
v.

ZELJKO RAKOCEVIC, an
individual; WESTEND SOFTWARE,
INC., a California corporation,

Defendants.

AND RELATED COUNTERCLAIM

Case No. CV 15-7481 JFW (KSx)

**JOINT STIPULATION OF
DISMISSAL WITH PREJUDICE AS
BETWEEN (1) DEFENDANT AND
COUNTERCLAIMANT WESTEND
SOFTWARE, INC. AND (2)
COUNTERDEFENDANTS
TIMOTHY MEDORA AND THE
MEDORA GROUP, INC.**

1 Plaintiffs and Counterdefendants Dependable Solutions, Inc., Dependable
2 Rights, Ltd., and Martin Malysz, Defendant and Counterclaimant WestEnd Software,
3 Inc. (“WestEnd”), Defendant Zeljko Rakocovic, and Counterdefendants Timothy
4 Medora and The Medora Group, Inc. (collectively, the “Medora Parties”) stipulate,
5 pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii), to the dismissal, with prejudice, of all
6 claims asserted in this case as between WestEnd and the Medora Parties.

7 The parties have agreed that WestEnd and the Medora Parties will bear its own
8 attorneys’ fees, costs, and expenses vis-à-vis the other.

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10 Dated: March 17, 2016

11 PILLSBURY WINTHROP SHAW PITTMAN LLP
12 Jeffrey D. Wexler

13 By: /s/ Jeffrey D. Wexler
14 Jeffrey D. Wexler, Attorneys for Plaintiffs
15 and Counterdefendants Dependable
16 Solutions, Inc., Dependable Rights, Ltd.
and Martin Malysz and Counterdefendants
The Medora Group, Inc. and Timothy
Medora

17 Dated: March 17, 2016

18 THE MALONEY FIRM, APC
19 Patrick M. Maloney
Gene Williams

20 By: /s/ Gene Williams
21 Gene Williams, Attorneys for Defendant
22 and Counterclaimant WestEnd Software,
23 Inc. and Defendant Zeljko Rakocovic
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SIGNATURE CERTIFICATION

Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies and Procedures Manual and Rule 5-4.3.4(a)(2) of the Local Rules of the United States District Court for the Central District of California, I hereby certify that the content of this document is acceptable to Jeffrey D. Wexler, counsel for Plaintiffs and Counterdefendants Dependable Solutions, Inc., Dependable Rights, Ltd., and Martin Malysz, and Counterdefendants Timothy Medora and The Medora Group, Inc., and that I have obtained his authorization to affix his electronic signature to this document.

Dated: March 17, 2016

THE MALONEY FIRM, APC
Patrick M. Maloney
Gene Williams

By: /s/ Gene Williams
Gene Williams, Attorneys for Defendant
and Counterclaimant WestEnd Software,
Inc. and Defendant Zeljko Rakocevic